

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

(Draft)

Conditional Major, Operating / Construction

Permit: F-07-009 R2

ImagePoint, Inc.

Florence, KY 41042

December 4, 2008

Mark Labhart, Reviewer

SOURCE ID: 21-015-00009

SOURCE A.I. #: 37138

ACTIVITY ID: APE20080001

SIGNIFICANT PERMIT REVISION - F-07-009 R2:

ImagePoint has requested the removal of existing permit limitations therefore this permit action is be treated as a significant revision. Spraybooths 10R, 10L, and 25A were originally permitted together in with a 30 tpy emission limitation to meet the control requirement exemption in 401 KAR 61:132, Section 6 (3). Prior to issuance of permit F-07-009, the spraybooths 10R and 10L were being used exclusively for coating of plastic parts however the 30 tpy emission limitation remained. Now spraybooths 10R and 10L are being removed from the 30 tpy limit to provide ImagePoint with greater operational flexibility. Spraybooth 25A will still be subject to a 30 tpy limitation. Sourcewide emission limitations and potential to emit remain unchanged.

Also with this permit action a fiberglass reinforcement process was added to Section C of the permit, Insignificant Activities. This process was previously approved July 9, 2008 under 401 KAR 52:030, Section 17, Off-permit and Section 502(b)(10) Changes.

MINOR PERMIT REVISION - F-07-009 R1:

ImagePoint is adding an additional spray booth with this permit revision. The new spray booth, designated EP 25B (2), will be used to coat the back of the sign panels that were previously finished, front and back in the existing spray booth EP 25B. The existing spray booth, now EP 25B (1) will be used only for the front of the sign panels.

SOURCE DESCRIPTION - F-07-009:

ImagePoint manufactures architectural signage, lettersets and emblems, canopy systems and awnings, and other types of exterior and interior advertising displays made of plastic and metal. The primary source of emissions from this facility is from surface coating of sign parts.

COMMENTS:

- Kentucky's administrative regulations governing new and existing miscellaneous metal parts and products surface coating are applicable to minor sources in Boone County as this county is non-attainment for ozone. However, permitted VOC limitations exempt the source from these regulations.
 - a. 401 KAR 59:225, New miscellaneous metal parts and products surface coating operations is not applicable to the three (3) metal painting spray booths 11A, 12A, 25B.
 - (1) Existing permit conditions limit VOC emissions to 20 TPY for the new metal coating spray booths.
 - (2) 401 KAR 59:225, Section 6 (3) exempts the source from this administrative regulation if total VOC emission from all affected facilities subject to this regulation are less than or equal to twenty (20) tons per year.
 - b. 401 KAR 61:132, Existing miscellaneous metal parts and products surface coating operations is not applicable to the existing spray booth 25A.
 - (1) Existing permit conditions limit VOC emissions to 30 tons per year (tpy) for the existing metal coating booth 25A, and the plastic coating booths 10R, 10L.
 - (2) 401 KAR 61:132, Section 6 (3) exempts the source from this administrative regulation if the total VOC emissions from all affected facilities subject to the regulation are less than or equal to thirty (30) tpy.
 - (3) The permitted 30 tpy VOC emission limit applies to spraybooths 10R, 10L, which are used for coating plastic and therefore would never be subject to the regulation. Still, emissions from the affected facility 25A can never exceed 30 tpy as long as the source meets this overall emission limitation.
- Some of the existing spraybooths have been replaced since the initial VOC emission limitations were established (O-93-051). Specifically, the current booth 12a was installed as a replacement for previous booth 12a, and the spraybooths 10 A,B,C,D are replacement booths for 10L and 10R. The Division considers these replacement spraybooths as minor modifications. No significant changes in monitoring, recordkeeping, or reporting were necessary for the replacements, and per 401 KAR 52:030, Section 14 (1)(d), the permittee did not request any changes in overall emission limitations used to avoid an otherwise applicable requirement, (59:225 or 61:132). Therefore the existing 12-month VOC limitations have been carried forward to the new permit.
- Existing short-term hourly limits on VOC emissions (O-93-051) have been removed because the limits are extraneous. The limits are extraneous because the maximum hourly VOC emissions essentially represent a potential maximum applicator capacity and can not reasonably be determined by the source each hour without excessive burden. Monthly averages would be little use in determining the hourly emission rates, because the overall emission limitations are much more restrictive. In other words, an hourly average emission rate calculated on a monthly basis that approached the short-term emission limitations would consume the overall 12-month emission limitations in approximately 2-months time. Additionally, there are no health based standards or regulations applicable to "generic" VOC emissions with which to form the basis for any short-term limits.
- Existing individual permit limitations (O-93-051) on coating usage (gallons per year) for each spraybooth have been superseded by sourcewide emission limitations and therefore are not included in the current permit.

- Federal regulation 40 CFR 63, Subpart M— National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products is not applicable to this source due to the conditional major limitations.
- Potential VOC and HAP emissions calculated by material balance.
- Emission factors for natural-gas fired equipment from AP-42.

EMISSION AND OPERATING CAPS DESCRIPTION:

Permit Limitations pursuant to 401 KAR 52:030

Sourcewide VOC emissions <90 TPY

Sourcewide individual HAP emissions <9 TPY

Sourcewide combined HAP emissions <22.5 TPY

Other Permit Limitations

VOC emissions <20 TPY for spraybooths 11, 12A, 25B

VOC emissions <30 TPY for spraybooth 25A

PERIODIC MONITORING:

ImagePoint, Inc. shall report VOC and HAP emissions semiannually.

OPERATIONAL FLEXIBILITY:

ImagePoint, Inc. is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.